



Annual Performance Report Form

Facility Name: INERT Corporation

Performance Track ID #: A010012

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: July 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☒ Name of your facility: INERT Corporation
- A.2 ☒ Name of your parent company: INERT Corporation
- A.3 ☒ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Mr. Vern Gile
Title: Manager of Commodities Sales
Phone: 800-347-5560 Fax: 603-773-5643 E-mail: vgile@inertco.com
- A.4 ☐ Facility's location
Street Address: PO 146
Street Address (cont.): 16 Swamscott Street
City/State/Zip Code: Newfields, NH 03856-0146
- A.5 ☒ Facility's website address (if any): www.inertco.com
- A.6 ☒ Number of employees (full-time equivalents) who currently work in the facility:
☒ Fewer than 50 ☐ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☒ Does your company meet the Small Business Administration definition of a small business for your sector? ☒ Yes ☐ No
- A.8 ☒ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 421430 421930 421420 421690 _____
- A.9 ☒ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☒ Yes ☐ No
We have expanded our asset management capabilities by increasing the size and abilities of our Technical Services department. The expansion enables us to test and refurbish a wider range of electronic equipment.
- A.10 ☒ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
The NH Department of Environmental Services has revised its Universal Waste rules to include mercury, antifreeze, and cathode ray tubes. INERT Corporation's management of these items has been revised to comply.

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

An ISO 14001 Certification Audit conducted by Advanced Waste Management (AWM) on 8/9-8/10/01. The scope covered all ISO Standard clauses. AWM is an ANSI-RAB approved registrar. INERT Corporation is currently certified to ISO 14001 with surveillances performed every 6 mos by AWM. Prior to AWM, INERT Corporation had been ISO 14001 certified by ERM-CVS.

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

An internal EMS audit was conducted by Environmental Management Strategies, Inc. (EMSI) on 5/23-5/24/01. Scope covered all clauses of ISO 14001.

An internal semi-annual EMS surveillance audit was conducted by EMSI on 11/20/01. Primary audit focus on the following clauses: Environmental Policy, Environmental Aspects, and Communications. Secondary audit focus on the following clauses: Objectives & Targets, Environmental Management Programs, EMS Documentation, Document Control, Nonconformance, Corrective & Preventive Action, EMS Audits (Internal), and Management Review. The audit also focused on any nonconformances detected in previous EMS audits.

c. Was a compliance audit conducted? ☐ Yes ☒ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Note: A multi-media environmental compliance audit was not performed in 2001. However, based on the outline of our EMS, Aries Engineering performed a compliance audit on 02/25/02.

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

The environmental benefits of improved personal performance of employee work activities were found to be not specifically addressed in all training programs. Environmental training programs were revised to reflect such benefits. Program specific environmental training was behind schedule. External certification training was subsequently completed by November 2001. The EMS manual's table of contents was not synchronized with the manual contents (i.e., revisions dates and numbers, titles, etc.) and was corrected. Standard operating procedures for the management of precious metals and beryllium were absent. Standard operating procedures were created. The procedure for scale calibration was in need of revision. The procedure was revised.

The August 2001 EMS Certification audit revealed we were behind schedule in performing annual training on hazardous materials recognition for a number of employees. Refresher training was scheduled and implemented within one week after the audit. It was determined we did not define periods during which environmental response drills were to be conducted. The relevant document was revised to reflect standardized training periods. It was determined we did not define the period at which multi-media environmental compliance audits were to be conducted. The relevant document was revised (to reflect that such audits would be conducted within twelve month intervals).

The November 2001 semi-annual internal surveillance audit revealed that the revised environmental policy had not been physically posted in the facility. The policy was posted. It was determined that, although we conducted a Management Review of the August 2001 EMS Audit with senior management, we did not document the review. Subsequent reviews, based on organizational changes will be properly documented.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☒ Yes ☐ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* February 2002

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Eric Clouthier

Title: Site EH&S Manager

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* November 2001, February 2002

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the reporting year.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
WASTE - Total Solid Waste	INERT Corporation's goal is to recycle 80% of the solid waste (i.e.: styrofoam, shrink-wrap, packing material, plastics, cardboard, etc.) received. In 2001, 9,592,714 lbs of reusable/recyclable electronic assets generated 1,246,369 lbs of solid waste of which 792,253 lbs was recycled (64%). In 2000, 13,108,318 lbs of reusable/recyclable electronic assets generated 1,142,050 lbs of solid waste of which 783,994 was recycled (68.6%).
ENERGY USE - Total Energy Use	INERT Corporations's goal is to upgrade existing lighting with new, energy efficient devices. Measure and monitor as a percent of facility's square footage impacted by upgrades, and as a function of monthly pounds of product processed versus kilowatt hours used. Overall, reduce kwh by 20% by 12/31/03. In 2001, it was not financially viable to proceed with lighting retrofits. The ratio of Kwh versus pounds processed was 10.64 for 2001, versus 16.49 for year 2000. In year 2000, we used a total of 659,670 kwh. In 2001, we used a total of 865,372 kwh. There was no relevant improvement experienced.
WASTE - Hazardous Solid Waste	INERT Corporation's goal is to reduce the volume of manifested hazardous waste through additional recycling efforts. The stated goal is to recycle 95% of hazardous waste by 12/31/03. In 2000, we diverted 84.17% of total hazardous wastes from being manifested and treated by TSDF's. In 2001, we managed to increase our diversion (and concurrent recycling) of hazardous wastes from being manifested and treated by TSDF's to 96.43%.
PRODUCT PERFORMANCE - Expected Lifetime Energy Use of Product	INERT Corporation's goal is to establish a computer equipment donation program in an effort to extend the life-use. The goal was to donate 50 units per year by 12/31/03. In year 2000, we donated a total of 11 units. In 2001, we determined that we could not provide adequate support for a full program and decided to abandon the effort, with the net result being the donation of only 4 systems.

OTHER - Vendor Qualification	INERT Corporation performs comprehensive environmental compliance audits of its solid and hazardous waste vendors as a function of its EMS. The goal is to provide a reasonable measure of assurance that the vendor is environmentally compliant. Primary emphasis is on TSDFs and WTE incinerators. Secondary emphasis is on those vendors managing solid wastes. The goal for 2001 was to have conducted an audit of 100% of the TSDFs and WTEs. At the end of year 2001, 60% of the primary vendors had been audited and 75.0% of secondary vendors had been audited. Overall, INERT Corporation had audited 27.5% of all vendors at the end of year 2000. By the end of 2001, the overall rating was 45.7%

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): SOLID WASTE

Aspect (see page 16 of the instructions): TOTAL SOLID WASTE

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	783,994	792,253			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	1.0946			(optional)
<i>Basis for your Normalizing Factor*</i>	Gross weight of solid waste generated per year as a "byproduct" of electronic asset management program.				
<i>Normalized Quantity* (per year)</i>	783,994	723,783			913,640

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The category and aspect have been revised to better represent the volume of solid waste being recycled as a subset of total volume of manageable electronic assets which are being "recycled" through reuse in whole or part. Note that the data represents the poundage of solid waste actually being recycled. 2001 experienced a reduction in the gross volume of manageable assets of 3,515,604 lbs. which resulted in the generation of 1,246,369 lbs of solid waste, of which 792,253 lbs was recycled. 289,358 lbs was to a WTE facility. 2000 saw 1,142,050 lbs of solid waste generated, of which 783,994 lbs was recycled and 315,303 sent to a WTE facility. A greater percentage of unrecyclable materials was generated in 2001 when compared to 2000 which resulted in less recycling opportunities.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).
None.

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): ENERGY USE					
Aspect (see page 16 of the instructions): Total Energy Use					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	659,670	865,372			(optional)
<i>Measurement Units</i>	Kilowatt Hours				
<i>Normalizing Factor*</i>	1.0	.073			(optional)
<i>Basis for your Normalizing Factor*</i>	Total gross weight of received product (for the year).				
<i>Normalized Quantity* (per year)</i>	659,670	1,185,441			527,736
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

No improvement was achieved due to financial constraints. Increased use of our shredding system significantly increased overall electrical usage due primarily to contractual demands. A decrease in total gross weight processed also negatively impacted the normalized quantity.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None.

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): WASTE					
Aspect (see page 16 of the instructions): Hazardous Solid Waste					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	35,985	158,876			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	3.85			(optional)
<i>Basis for your Normalizing Factor*</i>	Gross weight of hazardous waste generated per year as a "byproduct" of solid waste.				
<i>Normalized Quantity* (per year)</i>	35,985	41,265			156,520
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The basis for the normalizing factor has been revised to better represent the volume of hazardous waste being recycled as a subset of the total volume of solid waste generated. Note that the data represents the poundage of hazardous waste actually recycled. Improvements in finding new markets for the recycling of batteries in conjunction with the New Hampshire Department of Environmental Services' incorporation of mercury containing devices and used antifreeze into its universal waste rules led to exceeding the stated goal of 95%.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).
None.

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): PRODUCT PERFORMANCE

Aspect (see page 16 of the instructions): Expected Lifetime Energy Use of Product

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	11	4			(optional)
<i>Measurement Units</i>	KwH				
<i>Normalizing Factor*</i>	1.0	.36			(optional)
<i>Basis for your Normalizing Factor*</i>	Number of units donated				
<i>Normalized Quantity* (per year)</i>	11	11.1			
*See pages 15-17 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

There was no improvement. Donations have proven to be unviable due to the level of technical support needed and software issues.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None.

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements). In 2001, INERT Corporation attended more than four dozen local, regional, national, and/or international conferences, expositions, and forums on electronics recycling and has been an invited guest speaker at several of these events. The main focus was to educate both business and the public on the environmental and data security liabilities associated with electronic equipment that has reached the end of its service life. INERT Corporation has hosted tours for local schools and universities and we participate in several educational programs with the local schools (such as job shadowing). We also participated in six question/answer format broadcasts on regional and national (NPR) radio stations. We have met with our local town council on multiple occasions to discuss a variety of business and environmental issues. Additionally we have had over half a dozen meetings with key local, state, regional, and federal legislators and regulators which included the representatives of the White House Committee on Environmental Quality.

INERT Corporation maintains a website making us accessible to the public.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL www.inertco.com; National Environmental Performance Track website as well)

☐ Open House

☐ Meetings

☐ Press Releases

☐ Community Advisory Panel

☐ Other

Section E

Self-Certification of Continued Program Participation

On behalf of INERT Corporation,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____ 9/16/02

Printed Name Mr./Mrs./Ms./Dr. Mr. Richard A. Schulman

Title Vice President - General Manager

Phone Number/E-mail Address 301-582-6190; rschulman@inertco.com

Facility Name INERT Corporation

Facility Street Address 16 Swamscott Street, Newfields, NH 03856

Performance Track Identification Number A010012

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.